

## **REMARKS**

Claims 13-15 are all the claims pending in the application.

### **I. Claim Rejections under 35 U.S.C. § 103(a)**

Claims 13-15 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicants Admitted Prior Art (AAPA) in view of Kadono et al. (“Error robustness memory management control operation”).

Claim 13, as amended, recites a determining step of determining, using a determining unit, whether or not the first picture, from among a plurality of pictures each having the predetermined picture number, is located immediately previous to a second picture in coding order; and a prohibiting step of prohibiting, using a prohibiting unit, the addition of the second memory management command when it is determined in the determining step that the first picture is not located immediately previous to the second picture in coding order.

Applicants respectfully submit that the prior art cited by the Examiner does not teach, suggest or otherwise render obvious the above-noted combination of features recited in claim 13.

First, regarding the AAPA, while the AAPA discloses that a memory management command may be retransmitted (e.g., see paragraph [0021]), Applicants respectfully submit that the AAPA does not disclose or in any way suggest the above-noted combination of features recited in claim 13 of a determining step of determining, using a determining unit, whether or not the first picture, from among a plurality of pictures each having the predetermined picture number, is located immediately previous to a second picture in coding order; and a prohibiting step of prohibiting, using a prohibiting unit, the addition of the second memory management command when it is determined in the determining step that the first picture is not located

immediately previous to the second picture in coding order.

Second, regarding Kadono, Applicants note that this reference discloses that a first picture is located immediately previous to a second picture, and that a second memory management command is added to the second picture (see Fig. 2).

Applicants respectfully submit, however, that while Kadono may disclose that a first picture is located immediately previous to a second picture, and that a second memory management command is added to the second picture, that Kadono does not disclose or in any way suggest the above-noted combination of features recited in claim 13 of a determining step of determining, using a determining unit, whether or not the first picture, from among a plurality of pictures each having the predetermined picture number, is located immediately previous to a second picture in coding order; and a prohibiting step of prohibiting, using a prohibiting unit, the addition of the second memory management command when it is determined in the determining step that the first picture is not located immediately previous to the second picture in coding order.

In view of the foregoing, Applicants respectfully submit that AAPA and Kadono, either alone or in combination, do not teach, suggest or otherwise render obvious the above-noted combination of features recited in amended claim 13. Accordingly, Applicants submit that amended claim 13 is patentable over the cited prior art, an indication of which is kindly requested.

It is noted that by providing the above-noted features recited in amended claim 13, that advantages are achieved over the prior art. In particular, by providing the above-noted features recited in claim 13, the picture to be managed under the retransmitted memory management command is always the immediately previous picture that is the first picture. Therefore, a

picture decoding apparatus which has obtained this re-added and retransmitted memory management command can identify the previous first picture as a picture to be managed under that memory management command even if there are a plurality of pictures of the predetermined picture number indicated by the memory management command, and thus can prevent occurrence of a malfunction caused by the retransmitted memory management command on the part of the picture decoding apparatus.

Regarding claim 14, Applicants note that this claim has been amended so as to recite the features of a determining unit operable to determine whether or not the first picture, from among a plurality of pictures each having the predetermined picture number, is located immediately previous to a second picture in coding order, the second picture being different from the first picture; and a prohibiting unit operable to prohibit the addition of the second memory management command when it is determined by the determining unit that the first picture is not located immediately previous to the second picture in coding order.

For at least similar reasons as set forth above with respect to claim 13, Applicants respectfully submit that the prior art of record does not disclose, suggest or otherwise render obvious the above-noted features recited in claim 14. Accordingly, Applicants submit that claim 14 is patentable over the cited prior art, an indication of which is kindly requested.

Regarding claim 15, Applicants note that this claim recites a determining step of determining, using a determining unit, whether or not the first picture, from among a plurality of pictures each having the predetermined picture number, is located immediately previous to a second memory management command in coding order; and a prohibiting step of prohibiting, using a prohibiting unit, the addition of the second memory management command when it is determined in the determining step that the first picture is not located immediately previous to

the second memory management command in coding order.

For at least similar reasons as set forth above with respect to claim 13, Applicants respectfully submit that the prior art of record does not disclose, suggest or otherwise render obvious the above-noted features recited in claim 15. Accordingly, Applicants submit that claim 15 is patentable over the cited prior art, an indication of which is kindly requested.

## **II. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may best be resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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